



7852 Walker Drive, Suite 200, Greenbelt, MD 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

RECEIVED

FEB - 6 2006

Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
c/o Natek, Inc., Inc.
236 Massachusetts Avenue, N.E. Suite 110
Washington, DC 20002

**EB Docket No. 06-36
EB-06-TC-060**

Re: CERTIFICATION OF CPNI FILING - FEBRUARY 6, 2006

**Tri-County Telephone Membership Corporation – FCC 499 Filer ID 809082
Tri-County Communications, Inc. FCC 499 Filer ID 809083**

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan
JSI Staff Director-Regulatory Affairs
sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary
Byron McCoy, Telecommunications Consumers Division
Best Copy and Printing (BCPI)

No. of Copies rec'd 044
List A B C D E

Echelon Building II, Suite 200
9430 Research Boulevard, Austin, Texas 78759
Phone: 512-338-0473
Fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve
Eagan, Minnesota 55121
Phone: 651-452-2660
Fax: 651-452-1909

547 South Oakview Lane
Bountiful, UT 84010
Phone: 801-294-4576
Fax: 801-294-5124

4625 Alexander Drive, Suite 135
Alpharetta, Georgia 30022
Phone: 770-569-2105
Fax: 770-410-1608

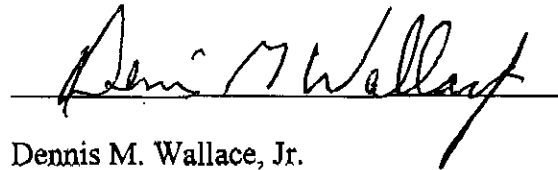
Tri-County Telephone Membership Corporation – FCC 499 Filer ID 809082

Tri-County Communications, Inc. FCC 499 Filer ID 809083

Belhaven, North Carolina

CERTIFICATION

I am Chief Executive Officer of Tri-County Telephone Membership Corporation. On behalf of Tri-County Telephone Membership Corporation, an ILEC operating in North Carolina and its affiliate Tri-County Communications, Inc., (collectively "Tri-County"), I hereby certify that I have personal knowledge that Tri-County is in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules.¹ Accompanying this certificate is a statement explaining how Tri-County is in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.



Dennis M. Wallace, Jr.
Chief Executive Officer
Tri-County Telephone Membership Corporation

February 3, 2006

Attachment

¹ 47 C.F.R. §§ 64.2001-2009.

Belhaven, North Carolina

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how Tri-County Telephone Membership Corporation, an ILEC operating in North Carolina and its affiliate Tri-County Communications, Inc., (collectively “the Company” or “Company”) are complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2009).

As of this date, the Company has not used nor plans to use CPNI for marketing. For marketing purposes, the Company uses customer billing name and address and/or telephone number without any segregation or refinement based on CPNI.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Section 64.2003(d) of the FCC’s Part 64, Subpart U CPNI rules.

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services offered by the Company that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2005 and/or Section 64.2008(c) as circumstances require.

5. Customer Notification and Authorization Process

Because the Company has not or does not have plans at this time to use CPNI for marketing, the Company has not implemented notice and approval procedures. However, the Company training and procedures have established appropriate awareness of the need for obtaining customer authorization to use CPNI for marketing purposes, and the specific notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. In the event the company undertakes to use CPNI for marketing and provides written notification, the Company's notification will comply with the requirements of the FCC's CPNI rules at Part 64, Subpart U, Section 64.2007(f)(2).

6. Training

The Company has trained existing employees and will train new employees having access to CPNI regarding the FCC's CPNI rules.

7. Record of Customer CPNI Approval/Non-Approval

Prior to undertaking to use CPNI for marketing, the Company will develop a system for maintaining readily accessible record of whether and how a customer has responded under either Opt-In or Opt-Out approval as the case may be as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

8. Disciplinary Process

In compliance with Section 64.2009(b) of the FCC's Part 64, Subpart U CPNI rules, the Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's CPNI rules.

9. Software Safeguards

Before undertaking to use CPNI for marketing purposes, the Company will establish procedures for maintaining a record of sales and marketing campaigns that use CPNI in compliance with the requirements of Section 64.2009(c) of the FCC's Part 64, Subpart U CPNI rules.

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.